

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

DECLARATION OF TRISTA SPEER

I, Trista Speer, declare as follows:

1. I am a resident of the State of Hawai‘i (State). I am over the age of 18 and have personal knowledge of all the facts stated herein, except those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the State of Hawai‘i, Department of Human Services as Deputy Director.

3. In August 2023, wildfires on the island of Maui (the 2023 Maui Wildfires), including the wildfire-initiated urban conflagration that caused extreme damage to the historic town of Lahaina, killed over 100 people and displaced thousands of Hawai‘i residents from their homes.

4. The Department of Human Services is responsible for administering the Federal Emergency Management Agency (FEMA) funded Disaster Case Management Program (DCMP) on behalf of the State for the survivors of the 2023 Maui Wildfires.

5. As a Deputy Director for the Hawai'i Department of Human Services, I was responsible for drafting and submitting the State's September 2023 application for the FEMA DCMP grant and overseeing the administration of the program on behalf of the state.

6. The DCMP connects survivors of disasters with specially trained Disaster Case Managers (DCMs) to help assess and address their disaster-related unmet needs. To accomplish this, DCMs work with survivors to create unique disaster recovery plans that are individualized to each household, and include resources, decision-making priorities, guidance, and tools. The DCMs act as a "quarterback" to help survivors navigate their recovery and work with the myriad of resources available to meet their needs. Our DCMP services are available to all survivors impacted by the 2023 Maui Wildfires.

7. The DCMP is a team of more than 120 staff members across the Department of Human Services, its contracted provider, and the provider's subcontracted local community-based organizations that provide these crucial recovery services to the more than 6,300 survivors we have assisted since November 2023.

8. The DCMP currently serves approximately 1,729 active cases, totaling more than 4,431 individuals, and has made more than 9,000 referrals to community resources which has resulted in approximately \$106 million of non-federal funds (Social Return On Investment) that have satisfied survivors' disaster related needs, and has successfully assisted more than 180 households to achieve their DCMP recovery plans.

9. To date, FEMA has awarded the State \$25,210,370.39 for a period of performance from August 10, 2023, through August 10, 2025, for the purpose of administering the DCMP.

10. The State has expended nearly all but approximately sixty (60) days of funds from the initial \$5,738,960 obligation.

11. On February 21, 2025, in accordance with FEMA guidance, the State submitted a second obligation request for \$5,738,959 (Second Obligation Request), and that request is still pending review with FEMA as of March 21, 2025, the date of the signing of this declaration.

12. On February 24, 2025, the State submitted a \$475,423.62 drawdown reimbursement request through the federal Payment Management System (PMS) for essential expenses incurred in the administration of the DCMP, including payroll and invoices for direct services to survivors (PMS Request). That request is still pending with FEMA as of the signing of this declaration.

13. In the past, it typically took approximately 1 week for the state to receive federal funds from a PMS drawdown request. This process is a result of 1 to 3 business days for FEMA to review and approve a PMS drawdown request, and then another one to three business days for the transfer of federal funds to the State.

14. Based upon the unprecedented delay in approvals, it appears to me that the disbursement of federal funds for the DCMP has been paused, frozen, blocked, suspended, or otherwise impeded by FEMA.

15. The state intends to submit another drawdown request on or about March 21, 2025, for approximately \$463,550 to cover additional essential expenses associated with the DCMP.

16. Our assigned FEMA grant team has stated via email, and I understand also verbally in our monthly FEMA grant team meeting, that there is no known timeline for when

FEMA or the federal Department of Homeland Security will determine if, or when, it will approve our pending PMS Request or the Second Obligation Request.

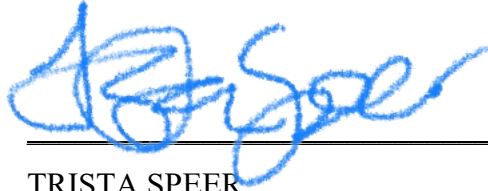
17. The Department of Human Services' budget for this year has relied on these FEMA grant funds, and we made plans and allocated funding for staffing, office space, telecommunications equipment, and entered into contractual agreements with non-profit organizations to manage and provide the direct disaster case management services to the more than 6,300 survivors assisted through this program—who lost nearly everything in devastating fires—based on the anticipated receipt of federal funding promised to be provided on a swift, and timely, reimbursable basis following grant fund drawdown requests.

18. Any pauses in our federal funding predictably result in the almost immediate cessation of the DCMP because a key requirement of FEMA regarding these grant funds is that the State is precluded from maintaining more than three (3) business days' worth of cash on hand. Specifically, because of the current pause, the Department of Human Services has informed FEMA that if the State does not receive notice of approval for the Second Obligation Request on or before March 31, 2025, all services of the DCMP will cease on **Friday, April 4, 2025**, due to insufficient funding.

19. The uncertainty of funding for this program has irreparably harmed this program in multiple ways, including: (1) our ability to hire additional staff and service providers as approved in the budget to meet the demand and capacity needed for these services for survivors; (2) our ability to timely cover expenses incurred by this program; (3) our ability to cover payroll for state employees hired and completely funded by these grant funds; and (4) our ability to provide assurances to the thousands of survivors served by this program that this critical assistance will continue as originally promised by FEMA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2025, at Honolulu, Hawai'i.

A handwritten signature in blue ink, appearing to read "Trista Speer", is written over a solid black horizontal line.

TRISTA SPEER